

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC

PLAINTIFF

and

GERALD KLEIS-PASARELL

PROPOSED CO-PLAINTIFF-INTERVENOR

VS.

ALAN BRAM GOLDMAN

DEFENDANTS

CIVIL NO. 20-1747 (PAD)

BREACH OF CONTRACT; SPECIFIC
PERFORMANCE OF CONTRACT;
REIMBURSEMENT OF FUNDS, COSTS
AND EXPENSES

**MOTION FOR LEAVE AND EXTENSION TO FILE
REPLY TO DOCKET 69 OPPOSITION TO MOTION TO INTERVENE**

TO THE HONORABLE COURT:

COMES NOW, Gerald Kleis Pasarell (“Intervenor” and/or “Kleis”), through the undersigned attorney and very respectfully states, alleges and prays as follows:

1. On June 25th, 2021, the Alan Bram Goldman (“Defendant” and/or “Goldman”). filed his Opposition to Motion to Intervene (“Docket 69 Opposition”).

2. Intervenor requests leave from this Court to file a Reply to Defendant’s Docket 69 Opposition. Additionally, Intervenor requests an extension of time of fourteen (14) days to file his Reply, that is, on or before July 16th, 2021.

3. The undersigned counsel requests said extension because the undersigned has been 1) preparing and participating in the discovery and case management in the cases of *Caballer v. Nidea Corp.*, Civ. No. B3CI201400380, *Vega v. Pep Boys*, Civ. Núm. SJ2020cv05968, *Camacho*

v. Claverol Siaca v. Rivera Siaca, DPR Civ. No. 17-1935, *Cruz v. Mr. Sun Concrete*, DPR Civ. No. 21-1064, *Álvarez v. Amgen*, AAA Case. No. 01-20-0019-3551, y *Heredia v. Ballester Hermanos, Inc.*, DPR Civ. No. 21-1126, and 2) working on appeals and certioraris in the cases of *Rodriguez y otros v. Del Valle y otros*, TPI Civ. Núm. KAC2015-0564, TA Caso Núm. KLAN202100234 y KLCE202100661, *Burgos v. SNC Technical Services, LLC y otros*, TPI Civ. Núm. CPE2018-0080, TA Caso Núm. KLCE202100115 y TS Caso Núm. CC-2021-0265, y *Saez v. Sitnasuak Native Corporation y otros*, TPI Civ. Núm. DPE2017-0530, TA Caso Núm. KLCE202100421.

4. This request is being made in good faith and is not intended to cause undue delay.

WHEREFORE, it is respectfully requested from this Honorable Court to 1) **GRANT** this Motion for Leave and Extension of Time to File Reply to the Defendant's Docket 69 Opposition on or before July 16th, 2021., and 2) **ISSUE** any other order it deems just.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

RESPECTFULLY SUBMITTED: In San Juan, Puerto Rico on this 2nd day of July, 2021.

S/VICTOR M. RIVERA-RIOS

VICTOR M. RIVERA-RIOS

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